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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR., on  
behalf of himself and all others  
similarly situated,

Plaintiff,

v.

SAMSUNG ELECTRONICS  
AMERICA, INC.,

Defendant.

Civil Action No. 17-01775 (MCA) (JSA)

Hon. Madeline Cox Arleo, U.S.D.J.  
Hon. Jessica S. Allen, U.S.M.J.

**Return Date:** April 15, 2024

**Oral Argument Requested**

**NOTICE OF MOTION FOR  
ISSUANCE OF A LETTER OF  
REQUEST FOR PRODUCTION OF  
DOCUMENTS**

**PLEASE TAKE NOTICE** that on April 15, 2024, or at such other date and time as may be set by the Court, Plaintiff Thomas Roger White, Jr., on behalf of himself and all others similarly situated (collectively, the “Plaintiffs”), by and through his undersigned attorneys, respectfully moves for issuance of a Letter of Request for International Judicial Assistance (“Letter of Request”) to the Central Authority of the Republic of Korea to compel the production of documents from a company located in the Republic of Korea, Samsung Electronics Co., Ltd.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, Plaintiffs will rely on the accompanying Brief in Support of their Motion for Issuance of a Letter of Request for Production of Documents, and all pleadings and proceedings on file.

**PLEASE TAKE FURTHER NOTICE** that a Proposed Letter of Request is being submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that, although Plaintiffs believe that a hearing on this Motion may not be required, Plaintiffs respectfully request a telephonic hearing in the event the Court has questions regarding the Motion or proposed Letter of Request.

Dated: March 15, 2024

By: s/ Gregory S. Mullens  
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